## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO

In re POLYURETHANE FOAM ANTITRUST LITIGATION	) ) ) MDL Docket No. 2196) Index No. 10-MD-2196 (JZ
This document relates to:	
ALL CASES	)

## SECOND AMENDED NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 30, the Direct

Purchaser (Class) Plaintiffs, the Direct Action Plaintiffs, and the Indirect Purchaser

(Class) Plaintiffs ("Plaintiffs") will take a deposition of Charles L. "Lewie" Moeller,

formerly of Flexible Foam Products, at Ungaretti & Harris LLP, Three First National

Plaza, 70 West Madison, Suite 3500, Chicago, IL 60602 on November 22, 2013 at

9:00 a.m. C.S.T. The testimony will be recorded by stenographic and videotaped means

by a person authorized to administer oaths. The deposition shall continue from day to

day until completed in accordance with the Federal Rules of Civil Procedure and the

orders of this Court. All parties are invited to attend.

Pursuant to the Court's order at the October 24, 2012 hearing (ECF No. 436 at 77–78), Plaintiffs provide a brief description of the deponent, to extent allowed by the protective order in this matter, as follows: **former president**.

Dated: October 2, 2013

/s/ William A. Isaacson\_\_\_\_\_

William A. Isaacson

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